IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA
Plaintiff

v.

[1] EDSEL SAMUEL TORRES-CANCEL,
Defendant

CRIM.NO. 21-041(RAM)

INFORMATIVE MOTION AND
MOTION TO CONTINUE STATUS CONFERENCE

TO THE HONORABLE COURT:

COMES NOW, the United States of America and Defendants, by and through the undersigned attorneys, and very respectfully state and pray as follows:

1.   A status conference is scheduled for February 17, 2022. ECF No. 40.

2.   The United States has provided discovery. A plea offer was recently tendered.

3.   Defense counsel indicated that he foresees the instant case will end in a non-trial disposition, once the that once the state case is resolved. ECF No. 37 at ¶ 4.

4.   The state murder case against defendant is still pending. A status conference is set for March 1, 2022. Per our conversations with the state prosecutor, it is not expected that the trial will take place before the summer months.

5.   Moreover, the subscribing AUSA will be out of the office on the date of the hearing and until February 26, 2022.

6.   It is respectfully requested that the Court continue the status conference for

at least 30 days.

7.   Defense counsel has indicated having no objection to the continuance of the status conference.

WHEREFORE it is respectfully requested that this Honorable Court take notice of the above and continue the status conference for a later date.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this February 11, 2022.

> W. STEPHEN MULDROW
> United States Attorney
>
> /s/ Jeanette M. Collazo-Ortiz
> Jeanette M. Collazo-Ortiz
> USDC No: 226803
> Assistant U.S. Attorney
> United States Attorney's Office
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this same date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel of record.

> *s/ Jeanette M. Collazo-Ortiz*
> Jeanette M. Collazo-Ortiz
> USDC No: 226803